

Application No. 10/604,709  
Amendment dated April 30, 2006  
Reply to Office action of March 9, 2006

Remarks/Arguments:

Regarding to claim objections due to 37CFR1.126, the mis-numbering problem have been considered and corrected.

Regarding to claim objections due to 35USC 112, the new contents about noise level and breeze level simulation have been removed as requested.

Regarding to the rejections to claim 1-8, claim 14,16,18 due to 35U.S.C. 103(a), I have following remarks and arguments:

1. The rejected claims in this patent solve a long-felt, long-existing but unsolved need to have a as-real-as-possible outdoor-scene-accessible window in a windowless room. It is well known that rooms without outdoor-scene-accessible windows cause problems such as mental isolation, low working spirit and no directs outdoor feeling if they are used as offices. This reality can be demonstrated by the fact that almost all offices with outdoor-scene-accessible windows are assigned to senior members in almost all companies. None of the references cited (US Patent 6,140,565 by Yamauchi et al., US Patent 6,919,892 by Cheiky and US Patent 5,881,471 by Kaluza, the references hereafter) solved this long-felt need, nor did they intend to, be implied to, think or mention about solving it.

2. The fact the references cited come from three different classes (33/563 for Kaluza, 84/612 for Yamauchi and 345/473 for Cheiky) means that combining the references is itself **non-obvious**. Furthermore, my application is classified as 715/865 (which may not be appropriate since my application has nothing to do with handicapped users), a different field from all the three references cited. How could the combination of three different fields, resulting in new application yet belongs to another field be **obvious**?

3. Quoting from page 12 of office action: "Therefore, having combined teaching of Yamauchi, Kaluza and Cheiky as a whole, **one of ordinary skill in the art would have found it obvious** to modify curtain images of Yamauchi using the window covering images taken by Cheiky from Kaluza's real window .....", one of ordinary skill in which art? In 33/563, 84/612, 345/473 or 715/865? To my knowledge, **one of ordinary skill in the art** of any of above four fields will need tremendous imagination to think about combination from any of the rest 3 fields. I cannot imagine that one of ordinary skill in the art of window treatment would have found it **obvious** to be able to combine art in image processing and art in animation and come out with an outdoor window simulation for a windowless room. If my invention were in fact obvious, those skilled in these arts would have implemented by the time this application filed. The lack of implementation has already proved the non-obvious feature of my invention.

4. The combination of the references may result in the image processing part of my application, but combination alone will not completely create my application without major modification.

Specifically, the modification includes at least addition and linking of hardware to existing hardware in monitors to achieve initial setup and manipulation of window coverings, plus the need to setup outdoor image source arrangement such as wired or wireless transmission from camera to image processing unit, which is neither required, mentioned or implied in any of the references.

5. Any of the references is an individually complete reference. Yamauchi et al. invented the method for displaying a visual image of a music system, involving composition of image icons for forming display images. It is complete and functional itself. Although it constitutes similar process in creating display images as in my application in terms of synthesis of images from image templates, my application involves more than image icons from memory. Cheiky et al. showed how to create more realistic animation for the talking head and again the invention is complete and functional itself. My application has no animation involved and is thus totally irrelevant to the reference by Cheiky et al., although the office action pointed out (page 11 through 12) that it can function as motion detector, which I think is not appropriate because my application can use commercial available simple motion detector performing simple motion detection. Using the algorithm from Cheiky et al. is clearly over kill. Consequently there is no logic behind it to combine Cheiky and Yamauchi for achieving the functions of my application. Overall, there is no reason to use parts from or add or substitute parts to any reference. In view of all details, combination of the references needs too many intermediate steps of modification to achieve all the functions and features provided in claim 1, 14 and 18, it is too involved to be considered obvious.

6. The fact that the references and my application all together represent four different fields, which means that all the arts in the references are non-analogous arts to my invention.

I sincerely hope that, by submitting above 6 reasons, you will reconsider the allowances of my claims. If you have any thing in mind for me to meet your requirement, please inform me directly, or even try to write the correct claims for me, so that I don't need to repeat after repeat. Thank you very much.

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Amendment to the drawings:

The attached sheets of drawings include changes to Fig. 1.

Attachment: Replace Sheet  
Annotated Sheet Showing Changes

The attached sheets of drawings also include changes to Fig. 2.

Attachment: Replace Sheet  
Annotated Sheet Showing Changes

The attached sheets of drawings also include changes to Fig. 3.

Attachment: Replace Sheet  
Annotated Sheet Showing Changes

Annotated Sheet

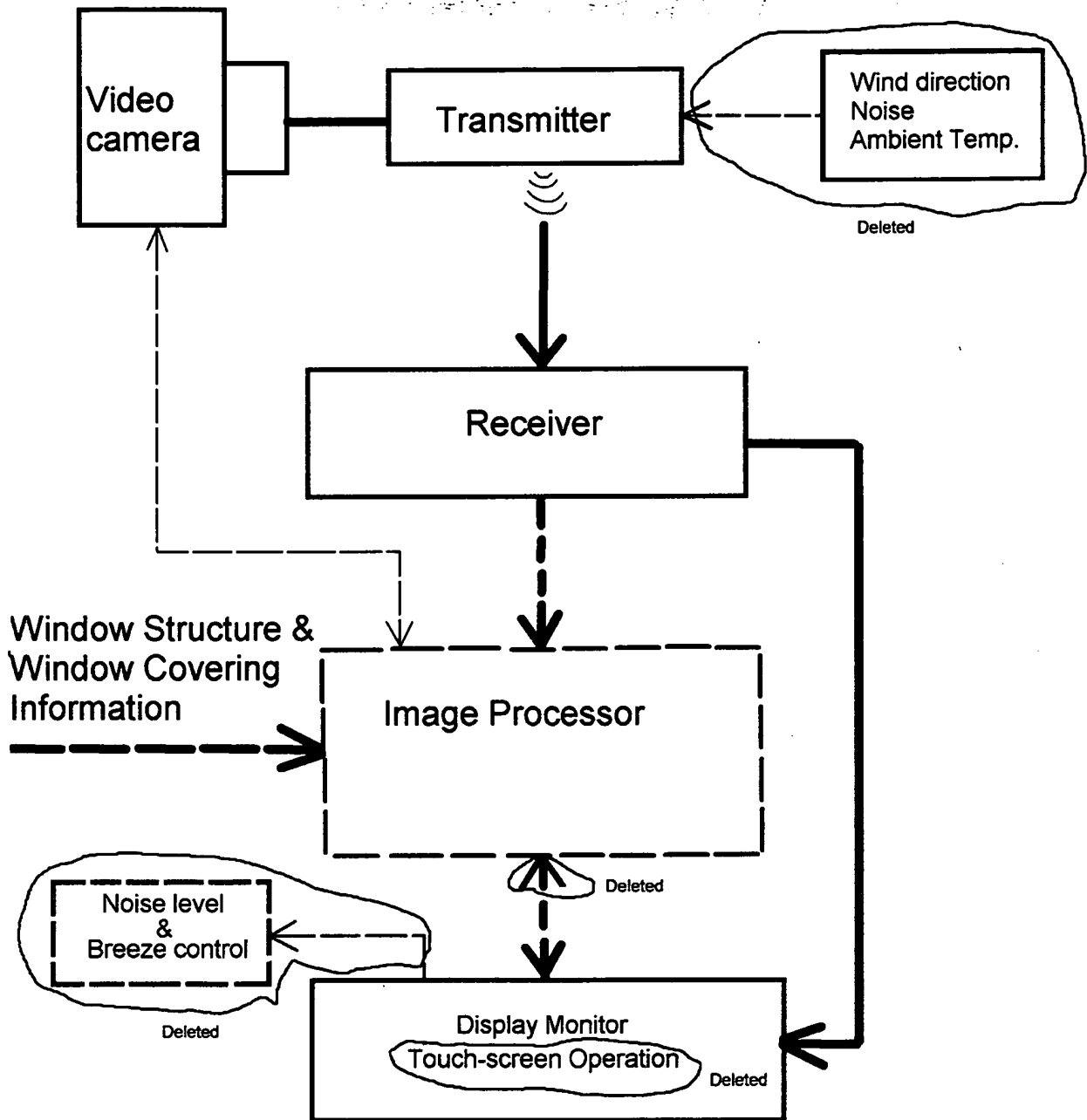


FIG. 1

Annotated Sheet

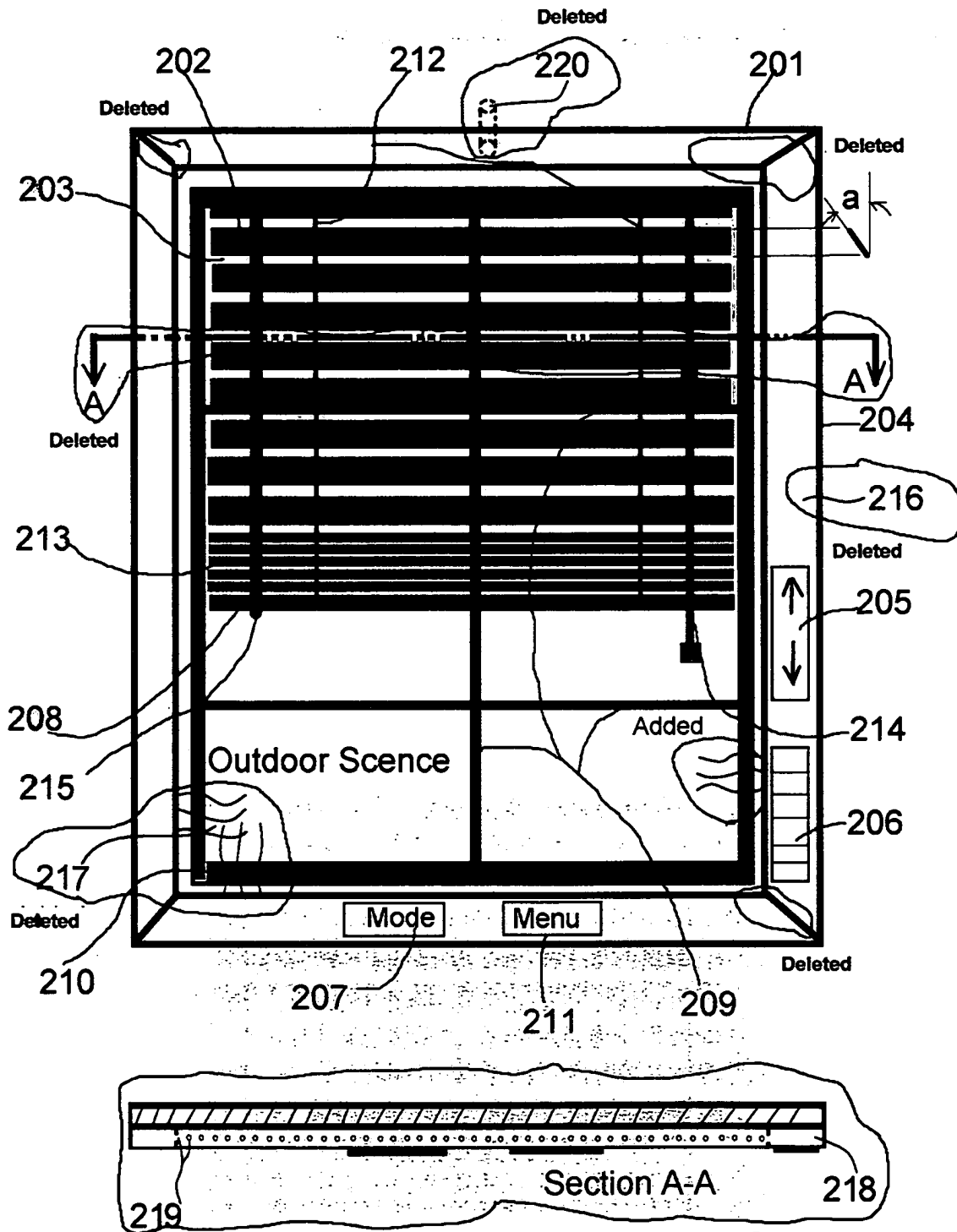


FIG. 2

Annotated Sheet

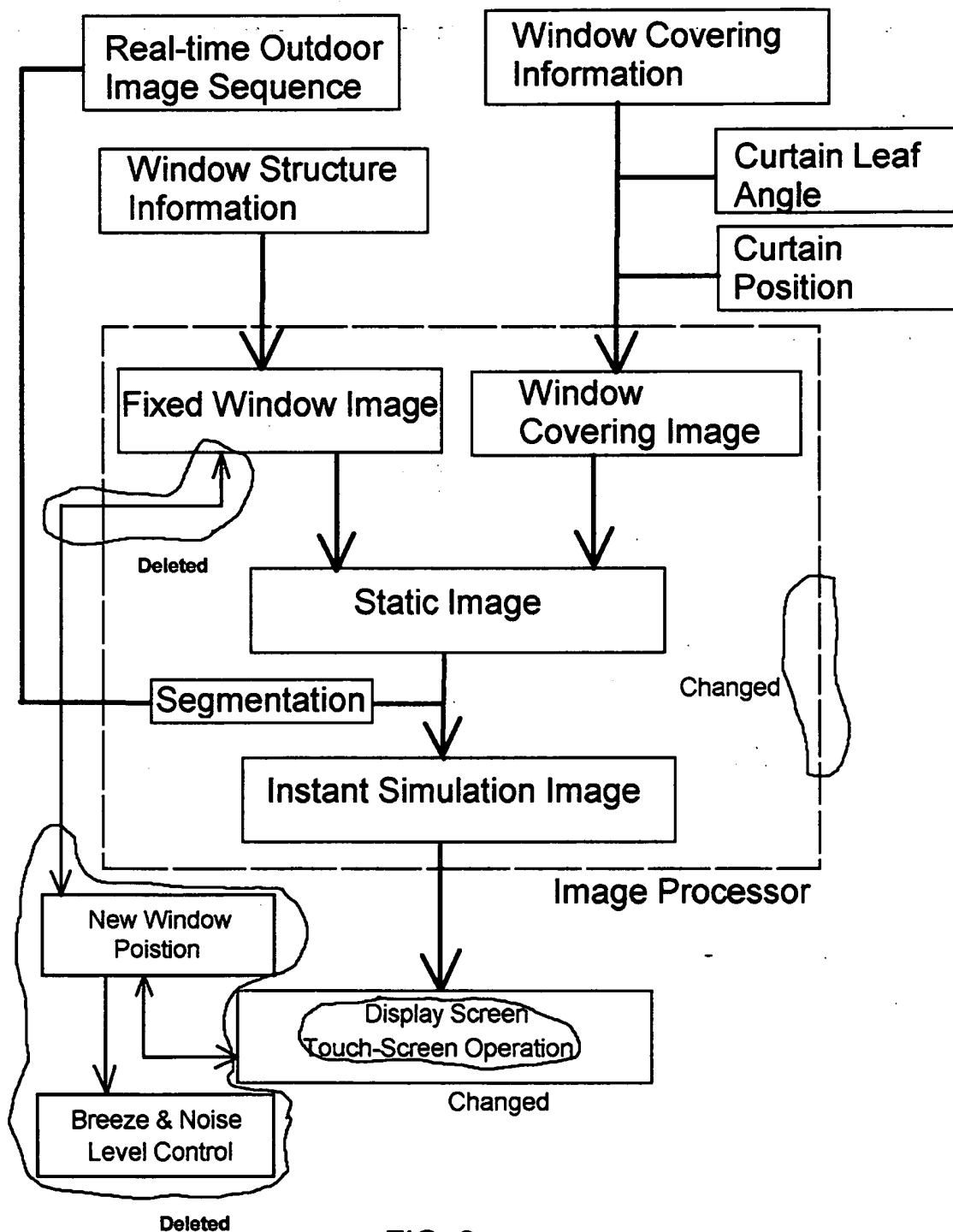


FIG. 3